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Counsel for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**GOOGLE LLC'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE: GOOGLE'S
OPPOSITION TO PLAINTIFFS'
MOTION TO EXCLUDE IN PART THE
OPINIONS OF GOOGLE'S SURVEY
EXPERT ON AMIR**

Judge: Hon. Yvonne Gonzalez Rogers

Pursuant to Civil Local Rule 79-5(f), Google LLC (“Google”) hereby files this Administrative Motion to Consider Whether Another Party's Material Should be Sealed, with respect to Google’s Opposition to Plaintiffs’ Motion to Exclude In Part the Opinions of Google’s Survey Expert On Amir. The below listed documents are subject to this Administrative Motion:

Document or Portion of Document to be Sealed	Party Claiming Confidentiality	Basis for Sealing
Portions highlighted yellow: Google LLC’s Opposition to Plaintiffs’ Motion To Exclude In Part the Opinions of Survey Expert On Amir	Plaintiffs	Contains Material Designated “Confidential” and/or “Highly Confidential” by Plaintiffs pursuant to the Protective Order
Portions highlighted yellow: Exhibit 1 to Olson Declaration - Excerpts of Plaintiffs’ Objections and Responses to Defendant’s Sixth Set of Interrogatories (No. 17)	Plaintiffs	Contains Material Designated “Confidential” and/or “Highly Confidential” by Plaintiffs pursuant to the Protective Order

Under Civil Local Rule 79-5(f), Plaintiffs, as the designating party, bear the burden of establishing that the designated material is sealable. Google takes no position on whether the aforementioned documents are entitled to confidential protection, or whether there are compelling reasons or good cause for keeping such information sealed. Google files the aforementioned documents provisionally under seal in order to provide Plaintiffs with the opportunity to justify sealing pursuant to Civil Local Rule 79-5(f).

DATED: September 28, 2023

Respectfully submitted,

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By /s/ Andrew H. Schapiro

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